

FILED

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

WENDELL BRYANT and
CIERA MORELAND,

Defendants.

4:20CR00741 MTS/SPM

INDICTMENT

The Grand Jury charges that:

COUNT I
(BANK FRAUD CONSPIRACY: 18 U.S.C. §1349)

INTRODUCTION

At all times relevant to this Indictment:

1. Vantage Credit Union, headquartered in Bridgeton, Missouri in the Eastern District of Missouri, is a financial institution within the meaning of Title 18, United States Code, Section 20, Subsection 2, the accounts of which are insured by the National Credit Union Share Insurance Fund.

2. Neighbors Credit Union, headquartered in St. Louis, Missouri in the Eastern District of Missouri, is a financial institution within the meaning of Title 18, United States Code, Section 20, Subsection 2, the accounts of which are insured by the National Credit Union Share Insurance Fund.

3. Together Credit Union, formerly Anheuser-Busch Credit Union, headquartered in

St. Louis, Missouri in the Eastern District of Missouri, is a financial institution within the meaning of Title 18, United States Code, Section 20, Subsection 2, the accounts of which are insured by the National Credit Union Share Insurance Fund.

4. Defendant **WENDELL BRYANT** is the registered owner of UCity Convenience Mart, LLC with a business address of 8509 Olive Boulevard. UCity Mini Mart, the same business at the same location operating under a different name, has a primary phone number of (XXX) XXX-1000 and a fax number of (XXX) XXX-2261. Phone number (XXX) XXX-1000 is associated with Defendant **WENDELL BRYANT** on multiple accounts and databases.

5. STL Power Motors has a motor vehicle dealer registration with the Missouri Department of Revenue (hereinafter "DOR"), which allows STL Power Motors to buy and sell vehicles in the State of Missouri. The dealer application filed with DOR lists L.M., an associate of Defendant **WENDELL BRYANT**, as the owner of STL Power Motors. STL Power Motors reported to the DOR that it had sold no cars in the year 2019.

THE CONSPIRACY AND SCHEME TO DEFRAUD

6. The allegations contained in paragraphs 1-5 of the Indictment are re-alleged and incorporated by reference as if stated in full herein.

7. Beginning in or around September 2019 and continuing through on or about November 2019, in the Eastern District of Missouri, the defendants **WENDELL BRYANT** and **CIERA MORELAND**, did voluntarily and intentionally combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit Bank Fraud, that is, knowingly executing, or attempting to execute, a scheme or artifice—(1) to defraud a financial institution; or (2) to obtain any of the moneys, funds, credits, assets, securities, or other property owned by, or under the custody or control of, a financial institution, by means of false or

fraudulent pretenses, representations or promises, in violation of Title 18, United States Code, Section 1344.

MANNER AND MEANS

8. In furtherance of the conspiracy and to effect the illegal objects thereof, defendants **WENDELL BRYANT** and **CIERA MORELAND**, and others known and unknown to the Grand Jury, used the following ways, manner and means, among others to commit bank fraud.

9. The primary purpose of the conspiracy was for defendants **WENDELL BRYANT** and **CIERA MORELAND** to fraudulently obtain loans from financial institutions to purchase vehicles that were not in the custody or control of STL Power Motors.

10. It was part of the conspiracy that defendant **CIERA MORELAND** submitted auto loan applications to Vantage Credit Union, Neighbors Credit Union, and Together Credit Union for the stated purpose of purchasing automobiles from STL Power Motors.

11. It was further part of the conspiracy that defendant **WENDELL BRYANT** caused the fax transmission of automobile purchase orders to Vantage Credit Union, Neighbors Credit Union, and Together Credit Union for vehicles that were not in the custody or control of STL Power Motors using fax number (XXX)-XXX-2261.

12. It was further part of the conspiracy that defendant **CIERA MORELAND** submitted false and fraudulent pay stubs from People's Health Centers to Together Credit Union in order to obtain the auto loan. Defendant **CIERA MORELAND** also listed People's Health Center as her employer on each of the auto loan applications. At no point in 2019 was defendant **CIERA MORELAND** employed by People's Health Centers.

13. Once defendant **CIERA MORELAND** obtained the loan proceeds from Vantage Credit Union, Neighbors Credit Union, and Together Credit Union, the funds were deposited into

a Bank of America (hereinafter "BOA") account in the name of STL Power Motors, Account # XXXX XXXX 5574. The BOA account was opened under STL Power Motors as an S Corporation, with defendant **WENDELL BRYANT** and L.M. listed as the individual customers. Specifically, on the following dates, Defendant **WENDELL BRYANT** caused the following deposits to be made into the STL Power Motors BOA account:

Loan Bank	Date	Deposit Location	Deposit Amount
Vantage Credit Union	October 18, 2019	STL Power Motors BOA Account # XXXX XXXX 5574	\$33,389
Neighbors Credit Union	October 23, 2019	STL Power Motors BOA Account # XXXX XXXX 5574	\$29,500
Together Credit Union	October 30, 2019	STL Power Motors BOA Account # XXXX XXXX 5574	\$27,889

14. It was further part of the conspiracy that on November 4, 2019, STL Power Motors wrote Check #5013 in the amount of \$24,887 to defendant **CIERA MORELAND** for "property." The check was signed by defendant **WENDELL BRYANT** and endorsed by defendant **CIERA MORELAND**. Defendant **CIERA MORELAND** deposited Check #5013 into her Commerce Bank Account #XXXXXX6920.

15. It was further part of the conspiracy that on November 8, 2019, one cashier's check totaling \$15,950 was purchased by STL Power Motors and made payable to "D and C to Your Rescue, LLC." Defendant **CIERA MORELAND** incorporated "D and C to Your Rescue, LLC" with the Missouri Secretary of State on March 10, 2016. The cashier's check made out to "D and C to Your Rescue, LLC" was endorsed by defendant **CIERA MORELAND** and deposited into her PNC Bank business checking account in the name of D and C to Your Rescue, LLC with an account number of #XXXXXXX2576.

16. In between on or about September 2019 and on or about November 2019, conspirators **WENDELL BRYANT** and **CIERA MORELAND** conspired to obtain three loans in connection with false and fraudulent vehicle purchases from three separate financial institutions in the Eastern District of Missouri.

All in violation of Title 18, United States Code, Sections 1349.

COUNT II
(BANK FRAUD: 18 U.S.C. § 1344)

17. Each of the allegations of Paragraphs 1 through 16 of this Indictment is hereby incorporated by reference as if fully set forth herein.

18. On or about the dates listed below, within the Eastern District of Missouri and elsewhere, having devised the foregoing scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of, a financial institution, by means of material false and fraudulent pretenses, representations, and promises, and for the purpose of executing the same,

WENDELL BRYANT,

the defendant herein, did represent that the following vehicles were in the custody and control of STL Power Motors, and deposited and caused to be deposited the following checks into other financial accounts:

Loan Bank	Date	Vehicle	Loan Amount
Vantage Credit Union	October 15, 2019	2015 BMW X6 X drive 35i	\$33,389
Neighbors Credit Union	October 20, 2019	2010 Porsche Panamera 4S	\$29,500
Together Credit Union	October 25, 2019	2017 Toyota 4Runner 4WD SR5 4D Sport Utility	\$27,889

All in violation of Title 18, United States Code, Sections 1344 and 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1349 or 1344 as set forth in Counts I and II, **Defendants Wendell Bryant and Ciera Moreland** shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to such violations. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to such violation, which is at least \$90,778.

2. Pursuant to Title 18, United States Code, Sections 982(a)(2), upon conviction of an offense in violation of Title 18, United States Code, Section 1344 as set forth in Count II, **Defendant Wendell Bryant** shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violation. Subject to forfeiture is a sum of money equal to the total value of any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation, which is at least \$90,778.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided
without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to
Title 21, United States Code, Section 853(p).

A TRUE BILL.

JEFFREY B. JENSEN
United States Attorney

FOREPERSON

LINDSAY L. MCCLURE-HARTMAN, #66070MO
Assistant United States Attorney